

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TARON POPE (1)  
CARLEY MOORE (2)

Defendants.

CASE NO.: 1:21-cr-

**1:21 CR 102**

**J. COLE**

INDICTMENT

18 U.S.C. § 922(d)(1)  
18 U.S.C. § 924(a)(2)

NOTICE OF FORFEITURE

**FILED**

TIME **3:36 PM**

THE GRAND JURY CHARGES THAT:

SEP 22 2021

COUNT ONE  
(Possession by a Prohibited Person)

RICHARD W. NAGEL  
Clerk of Court  
CINCINNATI, OHIO

On or about April 29, 2021, the exact date being unknown, in the Southern District of Ohio, the defendant, **CARLEY MOORE**, knowingly gave a firearm, that is a Smith and Wesson model M&P 15-22, .22 caliber pistol serial number WAK0152 to **TARON POPE**, knowing or having reasonable cause to believe that **TARON POPE** had been convicted of a crime punishable by imprisonment for term exceeding one year, in violation of Title 18 USC Sections 922(d) and 924(a)(2)

**In violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2) and 2.**

COUNT TWO

(False Statement during the purchase of a firearm)

On or about April 29, 2021, in the Southern District of Ohio, the defendants **TARON POPE** and **CARLEY MOORE**, in connection with the acquisition of a firearm, a Smith and Wesson model M&P 15-22, .22 caliber pistol serial number WAK0152, and ammunition from

American Traders, a licensed dealer in within the meaning of Chapter 44, Title 18 United States Code knowingly made a false fictitious written statement to American Trading which statement was intended and likely to deceive American Trading as to a fact material to the lawfulness of such sale of the said firearm and ammunition to the defendant under Chapter 44, Title 18 , in that the defendant represented that she was the true purchaser of that firearm and ammunition when she knew that the firearm and ammunition were going to be possessed by Taron Pope despite the fact that he was prohibited from that possession by law;

**in violation of Title 18 United States Code Section 922(a)(6), 924(a)(2) and 2**

**FORFEITURE ALLEGATION**


Upon conviction of one or more of the offenses set forth in Counts One and Two of this Indictment, the defendants, **CARLEY MOORE** and **TARON POPE**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in such violation(s), including but not limited to, a Smith and Wesson model M&P 15-22, .22 caliber pistol bearing serial number WAK0152, with any attachments and ammunition.

**A True Bill.**

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**Grand Jury Foreperson**

**VIPAL J. PATEL**  
**UNITED STATES ATTORNEY**

  
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**TIMOTHY D. OAKLEY**  
**Assistant United States Attorney**